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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Svyatoslav Bondarenko, *et al.*

Defendants.

Case No. 2:17-cr-306-JCM-PAL

**Government's Unopposed Motion
for Extension of Time re:
Complex Case Schedule**

(First Request)

The United States of America, by and through DAYLE ELIESON, United States Attorney, CHAD W. MCHENRY, Assistant United States Attorney, and KELLY PEARSON, Trial Attorney, respectfully submits this motion for an extension of time in which a complex case schedule may be filed pursuant to LCR 16-1(a).

FACTS

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2 1. The Indictment in this case was returned under seal by a federal Grand
3 Jury seated in Las Vegas, Nevada, on September 19, 2017. ECF No. 301 (redacted
4 and unsealed Indictment). Superseding and Second Superseding Indictments, also
5 under seal, were returned by the same Grand Jury on October 31, 2017, and January
6 30, 2018, respectively. ECF Nos. 302 (redacted and unsealed Superseding Indict-
7 ment), 303 (redacted and unsealed Second Superseding Indictment).

8 2. Defendant Pius Wilson (#23) made his initial appearance in this District
9 on March 6, 2018, and is represented by attorney Todd Spodek.

10 3. Defendant David Vargas (#27) made his initial appearance in this Dis-
11 trict on March 7, 2018, and is represented by the Federal Public Defender.

12 4. Defendant Sergey Medvedev (#2) made his initial appearance in this Dis-
13 trict on March 12, 2018, and is represented by attorney Lance Maningo.

14 5. Defendant Jose Gamboa (#19) made his initial appearance in this Dis-
15 trict on March 15, 2018, and is represented by attorney Thomas Ericsson.

16 6. Defendant John Telusma (#16) made his initial appearance in the East-
17 ern District of New York on February 7, 2018, and will make his initial appearance
18 in this District on March 21, 2018. He is represented by attorney Crane Pomerantz.

19 7. At this time, the remaining defendants in this case that the Government
20 is aware of are either pending extradition proceedings and seem unlikely to appear
21 before the Court in the immediate future, or are fugitives from justice.
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CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Attorney's Office. A copy of the foregoing **GOVERNMENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME RE: COMPLEX CASE SCHEDULE** was served upon counsel of record via Electronic Case Filing (ECF).

DATED this 15th day of March, 2018.

/ s / Chad McHenry

CHAD W. MCHENRY
Assistant United States Attorney

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4 **UNITED STATES DISTRICT COURT**
5 **DISTRICT OF NEVADA**

6 **United States of America,**

7 Plaintiff,

8 v.

9 **Svyatoslav Bondarenko, *et al.***

10 Defendants.
11

Case No. 2:17-cr-306-JCM-PAL

**Order on Extension of Time
re: Complex Case Schedule**

12 The Court having considered the proffer and unopposed motion submitted by
13 the Government, and good cause appearing:
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15 **IT IS ORDERED** that the deadline to file a complex case schedule in the
16 above-captioned case is set to April 4, 2018.

17 **DATED** this 21st day of March, 2018.
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21 Hon. Peggy A. Leen
22 United States Magistrate Judge
District of Nevada